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Attorneys for Defendant BROWN

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

United States of America,)	Case No.: 2:24:cr-00355-SPL
)	
Plaintiff,)	DEFENDANT'S MOTION FOR
)	PROTECTIVE ORDER
vs.)	
)	
Larry Edward Brown, Jr.,)	
)	
Defendant)	
)	

Defendant, through undersigned counsel and pursuant to Rule 16(d), Federal Rules of Criminal Procedure, hereby moves this Court to adopt the (proposed) Protective Order that is annexed hereto as Exhibit 1. In filing this Motion, counsel certify that good cause exists for the entry of a protective order and that the interests of justice so necessitate.

More specifically, on March 1, 2024, defense counsel served a written request for discovery on counsel for the Government. (Exhibit 2). On Wednesday, March 13, 2024, the Government made its first production of discovery available to the defense. (Exhibit 3).

Having conducted an initial yet thorough investigation of that discovery, defense counsel represents to this Court that the Government has redacted contact information for every single material witness such that the defense cannot readily locate them and conduct its investigation without jumping through the unnecessary hoops put in place by the Government. Other redactions, which the defense views as arbitrary and without justification include, but are not limited to, the redaction of phone numbers in the call logs from Defendant's mobile phone for the time frame near the conduct alleged in the Indictment that were extracted via Cellebrite.¹ Additionally, the Government has thoroughly redacted the name of the deceased victim (even though his identity is well known to the parties and has been reported in the media), yet, paradoxically, the body worn camera recordings produced by the Government contain numerous references to his identity.

Defense counsel inquired of the Government as to its rationale and legal basis for its "over-redaction", though no agreements could be reached.

The defense hopes that the entry of the proposed Protective Order submitted herewith will allow the Government to provide unredacted discovery in a meaningful

¹ Curiously, the Government went so far as to redact the *Defendant's own number* from these logs.

fashion without causing undue pretrial delay. This, in and of itself, constitutes good cause for the Court to grant this Motion.

Respectfully submitted this 18th of March, 2024

/s/Jason D. Lamm

Jason D. Lamm
Attorney for Defendant

/s/Jeffrey H. Jacobson

Jeffrey H. Jacobson
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2024, I electronically submitted the foregoing document to the Clerk's Office using the CM/ECF System for filing and notice will be sent to all parties by operation of the Court's electronic filing system.

/s/ Kathryn A. Miller